

EXHIBIT 4

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6 IN RE:

RESIDENTIAL CAPITAL, LLC,

Et al.,

Debtors,

) Civil Action No.

) 12-12020 (MG)

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14 CONFIDENTIAL DEPOSITION OF JOHN S. DUBEL

15 New York, New York

16 Wednesday, July 10, 2013

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24 Reported by:

25 JOMANNA DeROSA, CSR

JOB NO. 63468

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1 J. DUBEL - CONFIDENTIAL

2 MR. BAIO: All right.

3 Q. Who brought up the concept of
4 commutation in those discussions?

5 MR. SIDMAN: Objection. I'm going
6 to instruct the -- my client not to answer on
7 the -- on the basis of the mediation
8 privilege.

9 Q. You mentioned that there were
10 meetings from time to time that you participated
11 in on the official committee. Is that correct?

12 MR. EGGERMANN: I'm going to
13 interject for one moment. Daniel Eggemann
14 from Kramer Levin on behalf of the creditors
15 committee. I want to caution the witness not
16 to disclose any privileged communications with
17 counsel.

18 MR. BAIO: So you're trying to get
19 me coming and going is what I'm hearing.

20 Q. Anyway, you've heard the caution.
21 My question is: You mentioned that
22 there had been meetings from time to time that you
23 participated in on the official committee. Is
24 that correct? You had meetings from time to time?

25 A. I serve as a member of the official

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2 were drafts of the Settlement Agreement that were
3 communicated to -- from FGIC to other parties and
4 it came back from other parties with comments.

5 Q. When was the first such term sheet,
6 if you can recall?

7 MR. SIDMAN: I'm going to object
8 and instruct the witness not to answer that
9 question on the basis of mediation privilege.

10 MR. BAIO: Again, I'm not asking
11 for the substance. I believe that to test the
12 claim that this is all part of the mediation
13 and nothing else is subject to my being able
14 to challenge and explore.

15 Q. Did you see a document request that
16 we served in this case?

17 MR. SIDMAN: Objection to the form.

18 A. I don't know what the technical
19 term of it was, but I saw a request to FGIC of --
20 it was a document request or, you know, notice of
21 discovery. I don't know what the actual term was.
22 I saw something to that effect, yes.

23 Q. Okay. And did you search for
24 documents in connection with that?

25 MR. SIDMAN: I'm going to object --